Ginger G. Mooney, OSB # 031261 Ginger G. Mooney, LLC 1017 May Street, Suite 200 Hood River, Oregon 97031 (541) 716-5650 Fax (503) 389-1585 contact@mooneylaw.org Attorney for Adam Lyon

#### IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF OREGON

### **EUGENE DIVISION**

ADAM LYON,

USDC Case No. 6:20-cv-01883-JR

Plaintiff,

v.

MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST DEFENDANT CONTRERAS

OREGON STATE HOSPITAL, a state agency;
OREGON DEPARTMENT OF HUMAN
SERVICES, a state agency; OREGON HEALTH
AUTHORITY, a state agency; PATRICK ALLEN,
director of Oregon Health Authority; KRISTINE
KAUTZ, Deputy Director of Oregon Health
Authority; MIKE MORRIS, Behavioral Health
Director, Oregon State Hospital; DELORES
'DOLLY' MATTEUCCI, Superintendent, Oregon
State Hospital; DEREK WEHR, Deputy
Superintendent, Oregon State Hospital; CARMEN
CONTRERAS, MHTT, Oregon State Hospital;
STEPHEN BISHOP, MHTT- Security, Oregon State
Hospital; MICHAEL MURR, RN, Nurse Manager,

Oregon State Hospital; **BRYNN BROWN**, MHTT, Oregon State Hospital, **EUGENE DOE**, LPN,

Oregon State Hospital; **JOHN AND JANE DOE(S)**, each sued in their individual and official capacities,

**Hearing Requested** 

Defendants.

Plaintiff, Adam Lyon, by and through undersigned counsel, requests that the Court grant

# Page 1 of 2 – MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST DEFENDANT CONTRERAS

default judgment against **Defendant Carmen Contreras** pursuant to Federal Rule of Civil Procedure 55(b), in accordance with the enclosed Order Granting Judgment of Default. In support of this request, Plaintiff relies upon the record in this case and the supporting Declaration and

DATED this 6th day of July, 2021.

attachments submitted herein.

Respectfully submitted,

/s/ Ginger G. Mooney Ginger G. Mooney, OSB#: 031261 Attorney for Plaintiff

## **CERTIFICATE OF SERVICE**

I certify that I served a copy of plaintiff's MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST DEFENDANT CONTRERAS on counsel for the defendants by eService at their last known email addresses:

Jessica Spooner
Oregon Department of Justice
1162 Court Street NE
Salem, OR 97301
jessica.spooner@doj.state.or.us

Katherine Beck Oregon Department of Justice 1162 Court Street NE Salem, OR 97301 kate.beck@doj.state.or.us

I further certify that I served a copy of this document on the *pro se* defendant at the following last known address, by placing a certified copy in a sealed envelope in the mail in Hood River, Ore.:

Carmen Contreras 625 18th Street NE Salem, OR 97301

DATED this 6th day of July, 2021.

Respectfully submitted,

/s/ Ginger G. Mooney
Ginger G. Mooney, OSB#: 031261
Attorney for Adam Lyon
1017 May Street, Suite 200
Hood River, Oregon 97031
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